


**UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

NETLIST, INC.,)	
)	
Plaintiff,)	
)	Case No. 2:22-cv-293-JRG
vs.)	
)	JURY TRIAL DEMANDED
SAMSUNG ELECTRONICS CO, LTD;)	(Lead Case)
SAMSUNG ELECTRONICS AMERICA, INC.;)	
SAMSUNG SEMICONDUCTOR INC.,)	
)	
Defendants.)	

NETLIST, INC.,)	
)	
Plaintiff,)	
)	Case No. 2:22-cv-294-JRG
vs.)	
)	JURY TRIAL DEMANDED
MICRON TECHNOLOGY, INC.; MICRON)	
SEMICONDUCTOR PRODUCTS, INC.;)	
MICRON TECHNOLOGY TEXAS LLC,)	
)	
Defendants.)	

**DECLARATION OF JASON G. SHEASBY IN SUPPORT OF NETLIST'S
REPLY IN SUPPORT OF MOTION TO STRIKE CERTAIN OPINIONS OF
DEFENDANTS' EXPERT JOHN B. HALBERT (DKT. 358)**

I, Jason G. Sheasby, declare as follows:

1. I am an attorney at the law firm of Irell & Manella LLP, counsel of record for Plaintiff Netlist, Inc. (“Netlist”) in the above-captioned action. I am a member in good standing of the State Bar of California and have been admitted to practice *pro hac vice* before this Court in this action. I provide this declaration in support of Netlist’s Reply In Support of Netlist, Inc.’s Motion to Strike Certain Opinions of Defendants’ Expert John B. Halbert (Dkt. 358). I have personal knowledge of the facts stated herein, and could and would testify completely thereto if called as a witness in this matter.

2. Attached as **Exhibit 16** is a true and correct copy the Memorandum Order issued in *Netlist v. Micron*, Case 22-cv-203, Dkt. 462, dated January 26, 2024.

3. Attached as **Exhibit 17** is a true and correct excerpted copy of Samsung’s Supplemental Objections and Responses to Netlist’s Amended First Set of Interrogatories (Nos. 1-20), dated November 20, 2023.

4. Attached as **Exhibit 18** is a true and correct excerpted copy of Micron’s Corrected Sixth Supplemental Responses and Objections to Netlist’s First Set of Amended Interrogatories (Nos. 1-20), dated January 22, 2024.

5. Attached as **Exhibit 19** is a true and correct excerpted copy of Exhibit C to Dr. Mangione-Smith’s rebuttal report.

6. Attached as **Exhibit 20** is a true and correct excerpted copy of Netlist’s First Responses and Objections to Samsung’s Second Set of Interrogatories (Nos. 3-22), dated June 2, 2023.

7. Attached as **Exhibit 21** is a true and correct excerpted copy of Netlist’s Second Supplemental Responses and Objections to Samsung’s Second Set of Interrogatories (Nos. 3-22), dated August 31, 2023.

8. Attached as **Exhibit 22** is a true and correct excerpted copy of Defendants’

Second Set of Interrogatories (Nos. 16-22), dated October 13, 2023.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on February 7, 2024, in Los Angeles, California.

By /s/ Jason G. Sheasby
Jason G. Sheasby